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Re: Public Comments, DEIS, WOPR

Plan staff,

I consider your management analyses to be incomplete and lacking in adequate alternatives. You selected alternative does not meet legal standards for management of federal forests and is certain to result in endless litigation.

Specifically:

1. You have neglected to include the best course of action as an alternative for serious consideration. The ecologically and economically superior alternative is to forgo logging any more old growth or native forests entirely until you have thinned all the artificially established stands that have resulted from previous logging. You should have an alternative that closely adheres to the model forestry now being practiced on the Siuslaw National Forest where the public is closely involved with planning timber sales that thin young forest and improve their health and resiliency to disturbance. Your alternatives are nothing more than a series of scenarios that discuss "how much old growth to cut", hence they do not representative the real range of options available under the law.

2. Your alternatives will only waste taxpayer dollars in endless litigation over logging the few remaining old-growth and unroaded forests that the American public values so highly. The only alternative you describe that does not break the law (habitat protections, stream buffers, endangered species), and that will not be endlessly litigated is the "no action alternative". You are not serving anyone except moneyed interests and cynical anti-government factions when you subject the public (and yourselves) to more counter-productive litigation. The counties that have historically derived a portion of their revenues from federal forests will be much better served by a steady supply of funds from non-controversial thinning projects than by gridlock, no revenues, and wasted legal fees if you attempt to aggressively log old growth.

3. Your analyses do not include cumulative total estimates of the worth of all the other forest values that will be diminished by your unbalanced focus on big-tree timber revenues. *You should at least estimate the economic worth of these other values as best you can*, or else your analysis and discussion of the economic impact of your alternatives will be fatally flawed and argued in court.

Such resources, ecosystem services, amenities, and indirect values include:

Abundant clean municipal drinking water free of sediment or contaminants

Soil conservation, preserving site productivity, preventing landslides

World-class recreation opportunities for hunting, fishing, rafting, hiking, or harvesting forest products in native forests that have not been manipulated for timber.

Tourism amenities such as vistas, solitude, clean streams, and ancient forests

Traditional industries like coastal fisheries that require robust stream buffers

Cottage industries based on forest products (other than timber) that are found in older undisturbed forests (yew bark was a perfect unanticipated example)

Increased property values from being in, adjacent to, or looking upon well-managed public forests rather than clearcuts

Preservation of a rich legacy of biological diversity

Sequestration of carbon and contributions to slowing global warming (for this reason alone you should be growing much more old growth forest)

Mitigation of the effects of global warming on wildlife and vegetation populations that will need to migrate to survive

Quality of life and spiritual experiences

Go to the scientific literature on how these values can be estimated, and do so. Tally all these other values associated with healthy, thinned, intact, mature forests and calculate how much they would be reduced by your proposed aggressive logging of old growth.

Then add in endless litigation, social malaise, and wasted legal fees that will result from your alternatives.

4. Finally, estimate the cumulative harm from not focusing on thinning young forests that need to be thinned now. Such harm includes forgone future timber value and the increased risk of catastrophic fires.

The only alternative that will serve the highest and long-term public interest is one that avoids any more old growth logging or entries into roadless or native forests until all the young dense stands that should be thinned are.

Your DIES is inadequate until you include this alternative and analyze all the trade-offs thoroughly.

Sincerely,

Dave Pilz

A handwritten signature in cursive script, appearing to read "David Pilz".